

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PAUL PIZZUTO,)
Plaintiff,)
)
v.) DOCKET NO. 04-12492 GAO
)
AIRBORNE EXPRESS, INC., STEVEN)
CROSSKEN, JOSEPH HAMILTON,)
GREG SWEATT AND ARTHUR)
LEVERIS,)
Defendants.)

**JOINT MOTION TO EXTEND TIME FOR COMPLETION OF FACT DISCOVERY
AND FOR CONTINUANCE OF STATUS CONFERENCE**

The parties respectfully move for a further extension of the time for completion of fact discovery from 7/31/06 to 10/31/06 and to continue the Status Conference from 9/7/06 to a date in mid-November. In support of this motion, the parties state:

1. This is a complex employment discrimination case involving multiple claims, numerous witnesses now residing in various states and events spanning several years.
2. The additional time is requested to enable the parties to complete discovery to narrow the issues. Complicating this process are scheduling difficulties in the summer months regarding the availability of witnesses and counsel with vacation plans and other commitments.
3. The parties have been cooperative with each other regarding discovery in an effort to present and litigate the case on the merits without the need for undue intervention by the Court.
3. The parties are mindful and respectful of the Court's desire to avoid unnecessary delay, but hope that under the circumstances the Court will allow this joint motion.
4. In further support of this motion, both parties agree to the need for the extension

and neither side will be prejudiced as a result.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the deadline for completion of fact discovery be extended from 7/31/06 to 10/31/06 and that the Status Conference be continued from 9/7/06 to a date in mid-November 2006.

PAUL PIZZUTO,

AIRBORNE EXPRESS, INC., STEVEN
CROSSKEN, JOSEPH HAMILTON,
GREG SWEATT, AND ARTHUR
LEVERIS,

By his attorneys,

By their attorneys,

/s/ Richard A. Mulhearn

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Dated: June 19, 2006.